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**PROPOSED COUNSEL FOR THE DEBTOR**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:

SAMUEL E. WYLY,  
  
DEBTOR

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Case No. 14-35043

Chapter 11

**SUPPLEMENTAL DOCUMENT IN SUPPORT OF FIRST DAY MOTIONS**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

Samuel E. Wyly, the above-referenced debtor and debtor in possession (the “Debtor” or “Sam”) hereby submits the attached budget as developed in conjunction with Lain, Faulkner & Co., P.C. (the “Budget”) as referenced in the *Expedited Motion for Order on Estate Administration* [Docket No. 5] and *Expedited Motion for Interim and Final Orders Approving Use of Cash Collateral and Grant of Adequate Protection* [Docket No. 6] (collectively, the “Motions”) and in support of the Motions.

Dated October 21, 2014

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/s/ Josiah M. Daniel, III  
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**CERTIFICATE OF SERVICE**

I certify that on October 21, 2014, I caused a copy of the foregoing document to be served (i) by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas; (ii) via overnight delivery on all parties indicated on the attached proposed Limited Master Service List; and (iii) by e-mail or facsimile to those persons indicated on the Limited Master Service List.

/s/ Josiah M. Daniel, III  
One of Counsel